

NORTHWEST CORPORATE CREDIT UNION

July 25, 2006

FinCEN
P.O. Box 39
Vienna, VA 22183

Via email: regcomments@fincen.treas.gov

RE: Regulatory Identification Number (RIN) 1506-AA86

Northwest Corporate Federal Credit Union (Northwest Corporate) is pleased to submit comments to FinCen's request for comments regarding its advanced notice of proposed rulemaking regarding the threshold in the rule requiring financial institutions to collect and retain information on funds transfers and the transmittals of funds in the amount of \$3,000 or more.

By way of background, Northwest Corporate serves over 220 credit unions in the Northwest area of the country. Our average assets are approximately \$800 million. We provide a full range of investment, lending, payment systems and other correspondent system products and services.

After reviewing our internal processes, we determined that to collect and retain the information on all funds transfers, regardless of the amount, is not a significant burden. However, if there is an expansion to SAR reporting thresholds or if financial institutions are required to obtain personal beneficiary information, it would be a significant burden on our operations and processes as well as to our member credit unions.

If you have any questions, please contact me at (971) 244-6316.

Sincerely,



Kathy L. Garner
President/CEO